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FILED

JAN 23 2020 *AC*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

)
) No.

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

v.

)

DAYVON HICKS, a/k/a "Cashcalikush"

) Violations: Title 21, United States
) Code, Section 841(a)(1), Title 18
) United States Code, Sections
) 922(g)(1) and 924(c)(1)(A)

COUNT ONE

JUDGE CHANG

MAGISTRATE JUDGE CUMMINGS

The SPECIAL JANUARY 2020 GRAND JURY charges:

On or about July 18, 2019, at Des Plaines, in the Northern District of Illinois,
Eastern Division, and elsewhere,

DAYVON HICKS, a/k/a "Cashcalikush,"

defendant herein, did knowingly possess with intent to distribute a controlled
substance, namely, a quantity of a mixture and substance containing a detectable
amount of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWO

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about July 18, 2019, at Des Plaines, in the Northern District of Illinois, Eastern Division, and elsewhere,

DAYVON HICKS, a/k/a "Cashcalikush,"

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly possessed a firearm, namely, a Taurus Model G2C pistol, bearing serial number TLR70469, which firearm had traveled in interstate commerce prior to the defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about July 18, 2019, at Des Plaines, in the Northern District of Illinois, Eastern Division, and elsewhere,

DAYVON HICKS, a/k/a "Cashcalikush,"

defendant herein, knowingly possessed a firearm, namely, a Taurus Model G2C pistol, bearing serial number TLR70469, in furtherance of a drug trafficking crime for which defendant may be prosecuted in a court of the United States, namely, a violation of Title 21, United States Code, Section 841(a)(1), as set forth in Count One of this indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

FORFEITURE ALLEGATION

The SPECIAL JANUARY 2020 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841, as set forth in this indictment, defendant shall forfeit to the United States of America any property used, and intended to be used, in any manner and part, to commit and to facilitate commission of the offense, as provided in Title 21, United States Code, Sections 853(a)(2).

2. In addition, defendant shall forfeit to the United States of America, any firearm and ammunition:

a. involved in and used in any offense of conviction, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c); and

b. found in the possession and under the immediate control of the defendant at the time of arrest, upon conviction of any offense for committing and attempting to commit any felony involving the use of threats, force, and violence, and perpetrated in whole or in part by the use of firearms, as provided in 18 U.S.C. § 3665.

3. The property to be forfeited includes, but is not limited to, the Taurus Model G2C pistol, bearing serial number TLR70469, and associated ammunition.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY